

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

Defendants.

* * * * *

DECLARATION OF CHRISTOPHER MILLER

I, Christopher Miller, testify to the following:

1. That I am over the age of 18 years old and am competent to testify.
2. I was incarcerated at North Branch Correctional Institution (NBCI) for several years until early in 2023, when I moved Patuxent and I am now at Western Correctional Institution.
3. Housing Unit 2 at NBCI is the gang tier. That is where staff place the gangs and people who cause trouble at the facility.
4. In Housing Unit 2 you are locked down all day except for a 15-minute shower and one hour for recreation.
5. In Housing Unit 2, you have to file for a legal library visit and it takes months for such a request to be addressed.
6. The Administrative Remedy Process at NBCI is difficult to use. Inmates are not informed how to fill out an ARP form, who to give it to, or how to get the forms.
7. ARPs are not provided on inmate tablets.

8. Officers are often unwilling to provide ARP forms to inmates at NBCI.

9. When they provide the initial ARP form, it only provides a small blank to fill in the information and officers do not give you the continuation form.

10. In Patuxent, I was housed for a period of time in Administrative Segregation when Chloe Grey was there. She and I were on the same side of the tier.

11. One night staff allowed an inmate to leave his cell to act as a tier worker. He was not the usual tier worker. He approached Ms. Grey's cell, pulled his penis out, and asked if that is "what she liked," called Ms. Grey a "faggot," and continued to harass her. I could hear everything that happened from my cell.


12. Ms. Grey called for help, but was not responded to.

13. The tier worker continued to harass Ms. Grey for approximately 20 minutes before anyone intervened.

14. I have reviewed this declaration with counsel for Chloe Grey and am directing them to sign it for me. I understand that a copy will be mailed to me, inspected by the prison, and given to me to sign and mail back to counsel. That directly signed copy will be provided to the Court as well.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 15, 2024



Eve Hill (for Christopher Miller)

Executed on _____, 2024

Christopher Miller